

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

*Date: 05/31/2012
Time: 09:15 a.m.
Place: Albany, NY*

In Re: John C. Szumowski

Debtor(s)

**Address: 2484 Ridge Road
Scotia, NY 12302**

Last four digits of Social Security No.(s): 2830

**Case No.: 10-12431
Chapter 13**

**DECLARATION IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL TO THE DEBTOR**

RONALD J. KIM, ESQ., under penalty of perjury, declares as follows:

1. I am the attorney for the debtor herein, and I submit this declaration in support of the within motion for an order seeking permission to withdraw as counsel to the debtor in the instant Chapter 13 proceedings.
2. The debtor filed his Chapter 13 Bankruptcy petition on June 29, 2010, in order to stop a pending foreclosure.
3. The initial Meeting of Creditors was held on or about July 27, 2010.
4. On or about November 17, 2010, a motion objecting to the BAC Home Loans Servicing, LP's Proof of Claim was filed by our office with the consent of the debtor.
5. Extensive discovery has been conducted by our office in connection with this objection to Proof of Claim.
6. The debtor has ignored my recent requests to communicate regarding the status of the case and will not cooperate in his continued representation.
7. I have called and written the debtor on numerous occasions and have received no communication of any kind from him since on or about April 6, 2012.
8. I have been unable to maintain contact with the debtor and am unable to meet my obligations to the Court or to the debtor given the present lack of communication.
9. Pursuant to N.Y. Rules of Professional Conduct 1.16(b)(7) and Local Bankruptcy Rule 2091-1, I hereby move the Court for permission to withdraw as attorney of record pursuant to LBR 2091-1.

WHEREFORE, I, Ronald J. Kim, respectfully apply for approval by this Court to withdraw as attorney of record and for such other and further relief as may be just and proper.

Dated: Saratoga Springs
April 20, 2012

/s/Ronald J. Kim/s/
RONALD J. KIM